

civil No: unassigned

Dated: 3-6-2017

Anton. F. Liverpool

Inmate # 239142

Corrigan, CI

986 Norwich, New London, TPK.

Uncasville, CT, 06382

V S

17CV 2244

Reggie Cleveland

PBQV School Safety officer

976 Seneca, Ave, Queens, NY
(CS 77)

A complaint In Damages

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Michael, Merritt

64-2, Catalpa, Ave

Ridgwood Queens, NY, 11385

Shield # 5576 of the N.Y. P.D

SGT, Reiman Edward

64-2, Catalpa, Ave

Ridgwood, Queens, NY, 11385

of the N.Y. P.D

JA, Rampersant,

64-2 Catalpa, Ave

Ridgwood, Queens, NY, 11385

of the N.Y. P.D

Parties:

1. At all times herein mentioned the plaintiff Anton F. Liverpool [Liverpool] is and was A resident of the state of New York [the state].

Defendants:

2. At all times herein mentioned the defendant, Reggie Cleveland [Cleveland] is and was A safety officer for the state of New York [the state] School District.
3. At all times herein mentioned the defendant, SSA Michael Merritt Shield #5576, [Merritt], is and was A New York state law enforcement officer at the 104th precinct (104th) acting within the borough of Queens in the state of New York.
4. At all times herein mentioned the defendant, SSA Rampersant, Ja, is and was A New York state law enforcement officer, at the 104th precinct (104th) acting within the borough of Queens in the state of New York.
5. At all times herein mentioned the defendant, SGT, Edward Reiman, is and was A law enforcement officer for the state of New York, at the 104th precinct (104th) acting within the borough of Queens in the state of New York.

Count one:

- 1-6 paragraphs numbering 1-5 are incorporated here by reference as if set forth at length and made a part hereof this first count.
7. On or about October 15th 2014, Liverpool was at the side of 976 Seneca Avenue (ISTT) (Seneca Ave) A.L.
8. Liverpool then noticed defendant Cleveland stalking him on foot.
9. Liverpool then walked from the area of 976 Seneca Ave, and arrived at [2]

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the corner of Cortland Street and Cypress Ave. directly across
from 825 cypress Ave.

10. Then Liverpool noticed Cleveland with unknown school safety officers were in a van following Liverpool.
11. Cleveland then stopped the van, and exited vehicle with the officers, and surrounded Liverpool.
12. At which point Cleveland violently shoved Liverpool up against another van twice, and handcuffed him.
13. Cleveland acted in a reckless manner securing the handcuffs excessively tight so as to cause Liverpool pain to his wrists leaving swollen and painful indents on Liverpool's wrists.
14. Liverpool was then held until Merritt arrived on the scene, and was taken to the 104th precinct.
15. Liverpool was fingerprinted at the 104th precinct, and was charged with an act of public lewdness.
16. Liverpool was then taken to Queens district court for arraignment, and held in the custody of the Queens Department of Corrections for a total of approximately sixty (60) days. Then released following a dismissal in the interest of justice, for lack of evidence.
17. Liverpool was taken to and from court an approximate four to six times within that sixty day period.
18. While being transported to and from court Liverpool was subjected to confinement in unsanitary holding cell's, which had inoperable toilet's and sink's filled with human waste such as urine feces and vomit.

19. Liverpool's wrist and ankles became sore and painful due to handcuffs and leg shackles which left indents, being secured improperly - and/or too tightly.
20. The defendants knew or should have known the plaintiff would be harmed and injured as a direct and proximate result of their actions or lack thereof.
21. The plaintiff was harmed and injured including but not limited to:
- a) Spent approximately sixty days incarcerated, and out of work.
 - b) being handcuffed, and shackled to and from court approximately four to six times.
 - c) Loss of apartment clothing, electronics and jewelry.
22. Each defendant had a duty to protect the plaintiff from the actions of each of the other defendants, and failed in this duty.
23. Therefore, plaintiff prays the court grant the following relief:
- a) compensatory damages of \$ 60,000 \$
 - b) punitive damages of \$ 15,000 ⁰⁰
 - c) costs and attorney fees
 - d) such other relief as this court deems just and equitable
- Legal claims
24. Defendant's actions constitute cruel, and unusual punishment in violation of the Eight Amendment to the United States constitution, And in similar language of the New York state constitution.

25. The plaintiff has not brought any actions based on the facts alleged herein.

Jurisdiction

26. This action is brought to remedy the deprivation, under color of state law, of the plaintiffs rights guaranteed by the Eight and fourteenth Amendments to the United States Constitution and state of New York constitution provisions.

Previously Dismissed Actions or Appeals

27. Plaintiff has not had any actions dismissed as frivolous, malicious or for failure to state a claim upon which relief may be granted.

Jury Demand

28. The plaintiff waives his right to jury trial.

Declaration under penalty of Perjury

29. I hereby declare under penalty of perjury that I am the Plaintiff in the above action, that I have read the above complaint and that the information therein is true and accurate to the best of my knowledge and belief. I understand that if I lie in this Complaint I could be prosecuted for perjury and punished with as much as Five (5) years in prison and/or Fined up to \$250,000⁰⁰.

I therefore set forth my hand this the 6 day of March, 2017.
executed at uncasville, connecticut.

By Anton F. Liverpool
Anton F. Liverpool #239,142
986 Norwich, New London Tpk
uncasville, CT. 06382

1400218
ST. OF CT., DEPT. OF CORRECTION
LIVERPOOL, ANTON 239142
CORRIGAN CT
986 Norwich - New London Tpk
Uncasville, CT 06382

N.Y. Southern
U.S. Courthouse
500 Pearl St.
New York, NY 10007-1312

frh

THIS CORRESPONDENCE ORIGINATED
FROM AN INMATE AT A
CONNECTICUT CORRECTIONAL FACILITY

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LEGAL MAIL

